

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division**

J&J SPORTS PRODUCTIONS, INC.,)
Plaintiff,)
v.) Case No. 2011-cv-7077
)
GABRIEL MORALES, indv. and d/b/a)
MARISCOS EL BELLO MAR, INC. d/b/a)
MARISCOS EL BELLO MAR RESTAURANT)
and MARISCOS EL BELLO MAR, INC. d/b/a)
MARISCOS EL BELLO MAR RESTAURANT,)
Defendants.)

**PLAINTIFF'S MOTION TO REINSTATE AND ENTER AN ORDER OF
JUDGMENT AGAINST THE DEFENDANTS**

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., by and through its attorneys, ZANE D. SMITH & ASSOCIATES, LTD., and respectfully requests that this Court Reinstate this matter against Defendants, GABRIEL MORALES, indv. and d/b/a MARISCOS EL BELLO MAR, INC. d/b/a MARISCOS EL BELLO MAR RESTAURANT and MARISCOS EL BELLO MAR, INC. d/b/a MARISCOS EL BELLO MAR RESTAURANT, and enter an Order for Judgment, and in support thereof, states as follows:

1. That on April 5, 2012, this matter was dismissed by this Honorable Court, with leave to reinstate on or before June 1, 2012.
2. That a Settlement Agreement was entered into by both parties wherein which the Defendant would pay a total of \$10,000.00 to the Plaintiff. A down payment of \$2,500.00 was to be made on February 15, 2012 and payments in the amount of \$2,500.00 to be paid thereafter on the Fifteenth of each month starting March 15, 2012 and continuing through May 15, 2012, until the total amount was paid in full. See attached Exhibit A.
3. Defendant did pay the down payment and Plaintiff acknowledges receipt of \$2,500.00 towards the Agreement.
3. That the only payment received by Plaintiff was on February 15, 2012, and therefore, pursuant to the signed Settlement Agreement, the Defendants are in default.
4. Plaintiff has attempted to contact counsel for Defendants, Ramsey Lewis Mallory, regarding the default in the payment schedule, however, no response has been made. See

attached correspondence as labeled as Exhibit B.

5. That pursuant to the Settlement Agreement, Defendant currently owes Plaintiff a total amount of \$7,500.00 plus attorney's fees in the amount of Five Hundred and 00/100 (\$500.00). See attached Exhibit C.

6. Additionally, pursuant to the Settlement Agreement, Defendants agreed to pay a \$3,000.00 penalty fee should they default in payment. See attached Settlement Agreement.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an order to Reinstate this case against Defendants, GABRIEL MORALES, indv. and d/b/a MARISCOS EL BELLO MAR, INC. d/b/a MARISCOS EL BELLO MAR RESTAURANT and MARISCOS EL BELLO MAR, INC. d/b/a MARISCOS EL BELLO MAR RESTAURANT, and enter an Order for Judgment in the amount of Seven Thousand Five Hundred and 00/100 (\$7,500.00) plus attorneys fees in the amount of Five Hundred and 00/100 (\$500.00) and Three Thousand and 00/100 (\$3,000.00) in penalty fees for a total Judgment in the amount of Eleven Thousand and 00/100 (\$11,000.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the Notice of Filing was electronically filed with the Clerk of the Court on June 1, 2012, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

//s/ Andre Ordeanu
Andre Ordeanu

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